

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF DOCUMENT DISCREPANCIES

To: U.S. District Judge / U.S. Magistrate Judge RONALD S.W. LEW

From: Joseph Remigio, Deputy Clerk

Date Received: 10/23/2015

Case No.: CR 06-563 / CR 08-873

Case Title: U.S.A. v. Roth

Document Entitled: Letter to Judge Lew from Steven David Peisner dated 10/23/2015

FILED CLERK, U.S. DISTRICT COURT
NOV 11 2015
CENTRAL DISTRICT OF CALIFORNIA BY: <u>JRE</u> DEPUTY

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

- | | |
|--|---|
| <input type="checkbox"/> Local Rule 5-4.1 | Documents must be filed electronically |
| <input type="checkbox"/> Local Rule 6-1 | Written notice of motion lacking or timeliness of notice incorrect |
| <input type="checkbox"/> Local Rule 7-19.1 | Notice to other parties of ex parte application lacking |
| <input type="checkbox"/> Local Rule 7.1-1 | No Certification of Interested Parties and/or no copies |
| <input type="checkbox"/> Local Rule 11-3.1 | Document not legible |
| <input type="checkbox"/> Local Rule 11-3.8 | Lacking name, address, phone, facsimile numbers, and e-mail address |
| <input type="checkbox"/> Local Rule 11-4.1 | No copy provided for judge |
| <input type="checkbox"/> Local Rule 11-6 | Memorandum/brief exceeds 25 pages |
| <input type="checkbox"/> Local Rule 11-8 | Memorandum/brief exceeding 10 pages shall contain table of contents |
| <input type="checkbox"/> Local Rule 15-1 | Proposed amended pleading not under separate cover |
| <input type="checkbox"/> Local Rule 16-7 | Pretrial conference order not signed by all counsel |
| <input type="checkbox"/> Local Rule 19-1 | Complaint/Petition includes more than 10 Does or fictitiously named parties |
| <input type="checkbox"/> Local Rule 56-1 | Statement of uncontested facts and/or proposed judgment lacking |
| <input type="checkbox"/> Local Rule 56-2 | Statement of genuine disputes of material fact lacking |
| <input checked="" type="checkbox"/> Local Rule 83-2.11 | No letters to the judge |
| <input type="checkbox"/> Fed. R. Civ. P. 5 | No proof of service attached to document(s) |
| <input type="checkbox"/> Other: _____ | |

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- The document is to be filed and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date

U.S. District Judge / U.S. Magistrate Judge

- The document is NOT to be filed, but instead REJECTED, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have not been filed with the Court.

11/10/15

S/ RONALD S.W. LEW

Date

U.S. District Judge / U.S. Magistrate Judge

* The term "counsel" as used herein also includes any pro se party. See Local Rule 1-3.

Steven David Peisner

October 23, 2015

United States District Court
Hon. Ronald S.W. Lew
312 North Spring Street, Court Room 21
Los Angeles, CA 90012

Re.: Case CR 06-563(A)-RSWL & CR 08-873-RSWL
Randall Harris Register Number: 32994-112

Personal and Confidential

Dear Judge Lew,

My name is Steven Peisner I am the husband of Randall Harris Roth's ex-wife Helena Peisner (fka: Helena Roth). Please accept my apology in advance for the tone and sometimes sarcastic rhetoric of this communication, but I feel that you should be aware of the activities of former federal inmate Randall Harris Roth, the defendant in the above referenced cases that you presided over.

Mr. Roth is currently on probation and what I would refer to as "unsupervised" release as of March 11, 2011. I say this due to Mr. Roth's willful disrespect of the conditions of which release was predicated and General Order 318.

General Order 318 states that a defendant shall not commit another federal, state, or local crime.

Mr. Roth fails to abide by General Order 318 by passing bad checks to the State of California Child Support Services Department ~ California Penal Code 476(a) (check fraud). Mr. Roth has personally presented me with a check written on a Chase bank account which I presented twice for deposit and due to the fact that I bank at Chase I was unable to deposit the instrument as funds were unavailable.

General Order 318 states that a defendant shall support his or her dependents and meet other family responsibilities.

Mr. Roth fails to abide by General Order 318 by not fulfilling his Court Ordered Child Support Obligations on a timely basis. Mr. Roth openly defies the order by paying whatever amount he so chooses whenever he chooses. Mr. Roth currently owes in excess of \$500,000.00 in back child support and is as of the date of this letter six months behind in his current child support obligations. It should be noted that Mr. Roth's California Driver's license was suspended on September 12, 2015.

California Vehicle Code 14601 and its related sections make it a crime to drive when you *know* that your driver's license has been suspended or revoked. Mr. Roth is well aware of the fact that his driver's license is suspended as the California Child Support Services Department has informed him numerous times. Mr. Roth's Probation Officer Isaiah Muro is aware of his current and previous suspensions and he allows Mr. Roth the freedom to drive on California streets and freeways with a suspended license.

I am a bit perplexed as to why Officer Muro an appointed officer of the court whose sole duty is to supervise convicted felons allows Mr. Roth to openly defy the law and drive without a valid license.

One would imagine that paying the medical bills of your natural born children would also fall under this category, but I guess not as Mr. Roth would rather go on ski trips in the winter and road-trips in the summer to Mammoth Mountain with his new wife and children rather than pay his court-ordered obligations. I would like to bring to your attention that Mr. Roth has been presented with numerous medical bills from numerous medical providers and in some cases Mr. Roth has left payment up to me (which I have paid in order to avoid collection procedures). I am currently aware of medical bills due and owing to Children's Hospital Los Angeles as well as Dr. Jeffrey Schechter, DDS.

General Order 318 states that a defendant shall work regularly at a lawful occupation unless excused by the probation officer for schooling, training, or other acceptable reasons.

After executing a simple google search information regarding Mr. Roth's employment is easily found. Mr. Roth seems to be quite well since his release as it is written that he is the Cofounder and Chief Executive Officer of CSDR International, Inc. and the founder of Good Neighbor Solar located at 28632 Roadside Drive, Suite 175 Agoura Hills, CA 91301. I am a bit confused at the fact that Mr. Roth has made claims to me and Mrs. Peisner that "he has no money!" from this "lawful occupation." Perhaps his "failure to earn" has been excused by Officer Muro (who appears to be very lenient with Mr. Roth considering the number of infractions).

Mr. Roth's personal insecurities require him to maintain a braggadocios persona. On one occasion when Mr. Roth was late with his child support he begged me to convince his ex-wife not to notify child support services because his project was so close to being funded and that any interruption would blow the deal. Mr. Roth showed me letters of intent and contracts that reflected dollar amounts in excess of \$100MM and asked me to please keep his ex-wife under control. These contracts were between CSDR International, Inc. the company of which Mr. Roth is the CEO and VIVA DC Proyectos del Noroeste (VIVA). Perhaps Mr. Roth has found a new victim to defraud. Information regarding this company can be found at <http://csdrinc.com/>

I recently found information on the internet informing potential buyers/clients/general public that Mr. Roth is speaking at the TheVine in Irvine, CA regarding solar energy. At this conference you can meet the "inventor" himself and hear Mr. Roth speak at a Happy Hour in Irvine California on October 22, 2015. This is where "inventor Randall Roth, CEO of CSDR International and founder of Good Neighbor Solar, will be discussing existing solar-hydrogen hybrid solutions that produce oxygen and clean water as by-products." This event is in coordination with Coneybear Cleantech.

Moving on I would like to address the "Special Conditions for Probation and Supervised Release." The following passage is copied directly from Mr. Roth's Judgement and Probation Commitment Order:

The defendant shall maintain one personal checking account. All of the defendant's income, "monetary gains," or other pecuniary proceeds shall be deposited into this account, which shall be used for payment of all personal expenses. Records of all other bank accounts, including business accounts, shall be disclosed to the Probation Officer upon request.

Now this is where things get interesting. One would think that the word "one" as underlined above means one, but it is more than apparent that Mr. Roth's understanding of "one" as written in the above means "one" at a time. Mr. Roth has had numerous personal bank accounts since his release. It should also be noted that Mr. Roth is unaware of the definition of the word "All" as written above as Mr. Roth uses business accounts to pay personal expenses.

One of the reasons that Mr. Roth has opened so many different bank accounts is to avoid the Child Support Services Department (CSSD) sweeping his account due to the fact that he is a deadbeat-dad.

How I know that this action has occurred is due to the fact that he feels the need to inform my wife of the fact "that the CSSD took all of his money!" The CSSD does not take this action when a parent is current on their child support obligation.

Most interesting is Mr. Roth's interoperation of the phrase "*shall be used for payment of all personal expenses.*" Question: When is a personal expense not a personal expense? Answer: When you purposely use a corporation to hide what would otherwise be considered a personal expense. I am of the understanding that the expense of the home that an individual resides in with his family would be considered a personal expense. Not in this case as Mr. Roth has used his company to lease his personal residence. I am also aware of the fact that Mr. Roth's company is renting him a vehicle to drive not only for company business, but for his personal use.

During his supervised release Mr. Roth has used Diana Roth (his current wife) who is well aware of his release orders and his current child support obligations that he continuously fails to pay. I cannot imagine any woman I know in her right mind that would be willing and agree to pay her husband's child support obligations unless of course it was to assist in the hiding of money and make it easier for the defendant not to have a personal bank account that could be monitored by the probation officer assigned to the case.

Proof exists that Mr. Roth has enlisted the assistance of at least three other individuals/entities:

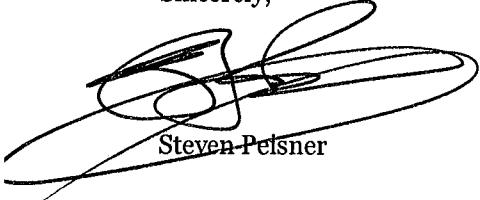
Mr. Eli Arneles
5416 Wellesley Drive
Calabasas, CA 91302

Mr. Canon Lifshitz
27828 Via Amistosa
Agoura Hills, CA 91301

Executive Healthcare Services, LLC
22668 Flamingo Street, #22668
Woodland Hills, CA 91364-4818

In closing I want you to know how grateful I am for your taking the time to read my rather lengthy letter and I hope I have provided enough information for you to minimally bring Mr. Roth back to your Honor's Court and remind him of the conditions of his release.

Sincerely,



Steven Pelsner

cc.:

Federal Probation Officer Gregory Kirk-Supervisor
Federal Probation Officer Isaiah Muro

Enclosures:

Please find enclosed the following items:

1. Copy of Roth's Residential Lease in the name of CSDR, Inc.
2. Notification of payment returned unpaid from the California Child Support Services Department.
3. A copy of a Cashier's Check made payable to Helena Peisner reflecting "ELI INDUSTRIES, INC." as remitter reflecting Final Nov Payment/Nov Paid in full
4. A check made payable to Helena Peisner from Concentrated Solar Research & Development with Randall Roth's as the signor.
5. A copy of Helena Peisner's personal bank statement reflecting inbound deposits from CSDR International, Inc., Diana Roth, and wire transfers Concentrated Solar Distribution on behalf of Randall Roth.
6. A copy of a cashier's check issued from 7 Eleven
7. A copy of a check from Randall Roth written on Wells Fargo in the amount of \$500.00
8. A copy of a check from Randall Roth written on Wells Fargo in the amount of \$1,000.00
9. A Cashier's Check in the amount of \$5,000.00 written on Chase made payable to Helena Peisner reflecting Randall Roth as remitter.
10. A Cashier's Check in the amount of \$5,000.00 written on Wells Fargo made payable to Helena Peisner reflecting Randall Roth-Child Support as remitter.
11. A copy of a Well Fargo starter check bearing no name signed by Randall Roth made payable to Helena Peisner in the amount of \$5,000.00
12. A copy of a Chase Bank check made payable to Helena Peisner in the amount of \$6,000.00 from Executive Healthcare Services, LLC reflecting memo note: Loan to Randy Roth
13. A printout from the California Secretary of State website showing Executive Healthcare Services, LLC as closed with the Agent for Service of Process: Marilyn Tikotin
14. A copy of the contact page from Peak Finance Company where Marilyn Tikotin works
15. A copy BOP Register information for Barry Tikotin (register number: 04375-112) known associate of Randall Roth